

JP:WDS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

MISAKI OKANO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL TZITZIKALAKIS, being duly sworn, deposes and states that he is a Special Agent with United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 21, 2011, within the Eastern District of New York and elsewhere, the defendant MISAKI OKANO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

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C O M P L A I N T

(21 U.S.C. §§ 952(a)
and 960)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. On January 21, 2011, the defendant MISAKI OKANO arrived at John F. Kennedy International Airport in Queens, New York, aboard American Airlines flight number 956 from Buenos Aires, Argentina.

2. The defendant MISAKI OKANO was selected by Customs and Border Protection ("CBP") officers for inspection. The CBP officer asked the defendant whether the bags he was traveling with were his own, whether he packed the bags himself, and whether everything in the bags belonged to him. The defendant replied "yes" to each of these questions.

3. The defendant presented a silver Conossa Actus suitcase, which, upon inspection contained a black briefcase. The briefcase appeared to be empty but was unusually heavy, and the sides of the briefcase felt thick and compacted. The CBP officer then removed the lining of the briefcase, which revealed three plastic bags. A probe of each of the bags revealed a white, powdery substance that field tested positive for the presence of cocaine. The defendant MISAKI OKANO was then placed under arrest.

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. The total gross weight of the cocaine recovered from the defendant's suitcase was approximately 5,228.2 grams.

WHEREFORE, your deponent respectfully requests that the defendant MISAKI OKANO be dealt with according to law.

MICHAEL TZITZIKALAKIS
Special Agent
Homeland Security Investigations

Sworn to before me this
21st day of January, 2011

THE HONORABLE ANDREW L. CARTER
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK